

# SOUTHWEST BROADBAND

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## ***Electronic Filing***

February 23, 2018

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commissions  
445 12<sup>th</sup> St. SW Suite TW-A325  
Washington, DC 20554

## **Docket No. 06-36**

## **RE: Annual Certification of CPNI Compliance Filing for 2017**

Dear Ms. Dortch:

Please find the enclosed "2017 CPNI Compliance Certification" filing for Southwest Minnesota Broadband Services. The documents consist of both the CPNI Certification along with the statement of procedures for our operational compliance with the FCC's CPNI rules. The filing was electronically completed on February 23, 2018.

If you have any questions regarding the filing, please contact me at (507) 662-4001.

Sincerely,

*Travis M. Thies*

Travis M. Thies  
General Manager



SMBS is an equal opportunity provider and employer

## **Annual 47 C.F.R. § 64.2009(e) CPNI Certification** **EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

1. Date filed: 2/23/2018
2. Name of company(s) covered by this certification: Southwest Minnesota Broadband Services
3. Form 499 Filer ID: 828963
4. Name of signatory: Travis M. Thies
5. Title of signatory: General Manager
6. Certification:

I, Travis M. Thies, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed Travis M. Thies

**Attachments:** Accompanying Statement explaining CPNI procedures



## Statement of Compliance Procedures for Customer Proprietary Network Information

### 1. Establishment of customer identity:

- Customers are required to establish and provide a password in order to gain access to information.
- Company representative may verify customer identity by calling the customer back at the number of record or by verifying proof of valid photo ID matching the customer's account information.
- Bill copies will only be provided via sending to the address of record either by postal or electronic form or in person with proof of valid photo ID.
- Further call detail requires a court order.

### 2. Notification of customer account changes:

- Customers are notified by company letter, text message, phone call or voicemail of any changes of CPNI information.

### 3. Establishment of customer approval for CPNI use in Marketing:

- Beginning in January 2017 and every other January thereafter, the company (a) provides notice of customers' rights to restrict use and disclosure of, and access to, their CPNI, in compliance with FCC Rule 64.2008, and (b) solicits Opt Out consent for the use of the customer CPNI, in compliance with FCC Rule 64.2008.
- All new customers will be required to consent or reject to the use of their CPNI at the time of application for service.
- Customer consent or rejection of CPNI use is flagged in the billing system customer master file.

### 4. Training of company personnel:

- Our company has designated a compliance officer to maintain and secure the company's CPNI records and to supervise training of all company employees.
- Our company trains its personnel as to when they are, and are not, authorized to use or disclose CPNI.
- Failure of any staff member to seek approval and/or comply with CPNI guidelines will be subject to disciplinary action by the company.

### 5. Records of CPNI use or disclosure:

- General Manager must give prior approval for any sales/marketing campaigns which plan to utilize CPNI.
- General Manager shall be responsible to maintain records for any sales/marketing campaigns which utilize CPNI for at least one year.
- General Manager shall be responsible to approve and maintain record of any instance where CPNI is disclosed to a 3rd party.
- General Manager and CPNI Compliance officer shall be responsible for annual review process of the compliance with CPNI rules.

### 6. Notification of Breach:

- A notification process is in place to notify both law enforcement and customer(s) in the event of a CPNI breach within the timeline specified by the FCC.

